



AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

AT 0'CLOCK for the  
Northern District of New York

UNITED STATES OF AMERICA

v.

Case No. 5:22-MJ-

687 (TWO)

MICHAEL GRISWOLD,

Defendant

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of November 9, 2022 in the county of Onondaga in the Northern District of New York the defendant violated:

*Code Section*

21 U.S.C. § § 841(a)(1) &amp; (b)(1)(B)

*Offense Description*

Possession With the Intent to Distribute a Controlled Substance, to wit: 50 Grams or More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine, a Schedule II Controlled Substance

This criminal complaint is based on these facts:  
See attached affidavit

☒ Continued on the attached sheet.

*Brandon T. Geer*

Complainant's signature

Brandon T. Geer, Task Force Officer

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: November 10, 2022

Judge's signature

City and State: Syracuse, New York

Hon. Thérèse Wiley Dancks, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Brandon T. Geer, being duly sworn, depose and state:

1. I am a Deportation Officer with the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE). I have been employed with ICE since November 2017. Prior to my employment with ICE, I was employed as a Border Patrol Agent with the United States Border Patrol for three years. I am currently assigned to the United States Department of Justice, Drug Enforcement Administration (DEA) Syracuse Resident Office (SRO) as a Task Force Officer, where I have been since October 2020

2. This affidavit is made in support of a criminal complaint charging Michael GRISWOLD (“GRISWOLD”) with possession with the intent to distribute a controlled substance, to wit, 50 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B).

3. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officers, and my training and experience. As this affidavit is being submitted for the limited purpose of establishing probable cause for a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that GRISWOLD possessed Methamphetamine with the intent to distribute.

4. Over the course of several months in 2022, investigators developed information that GRISWOLD was distributing methamphetamine and other drugs in the Syracuse, New York

area. That investigation indicated that **GRISWOLD** was operating his drug-trafficking operations from his residence, located at 103 Mary Street, Floor 2, Syracuse, New York 13208 (“**SUBJECT LOCATION**”). Information further indicated that **GRISWOLD** was utilizing a blue 2013 Cadillac SRX (“**SUBJECT VEHICLE**”) during his drug trafficking activities.

5. Based on this information, on November 8, 2022, a United States Magistrate Judge in the Northern District of New York signed search warrants, authorizing the search of **GRISWOLD**, the **SUBJECT VEHICLE** and the **SUBJECT LOCATION**.

6. On November 9, 2022, law enforcement members from the DEA, the Syracuse Police Department (SPD), and other agencies executed the search warrants. Inside the **SUBJECT LOCATION**, law enforcement located a blue shopping bag inside of a bedroom closet. The blue shopping bag contained a large quantity of a crystal-like substance in clear plastic bags. This crystal-like substance was seized and transported to the DEA SRO for further processing. The substance tested positive for the presence of Methamphetamine and was found to weigh approximately 500 grams.

7. At the DEA SRO, law enforcement conducted a video recorded interview of **GRISWOLD**. During this interview, **GRISWOLD** waived his *Miranda* rights and admitted to possession of the Methamphetamine in the blue shopping bag with the intent to distribute it.

8. For the reasons stated above, there is probable cause to believe that **GRISWOLD** possessed with intent to distribute a controlled substance, to wit, 50 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B). I respectfully request that the Court authorize the filing of this complaint so that the defendant may

be charged and brought to court for further proceedings in accordance with the law.

ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS OF RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE.

Brandon T. Geer  
Brandon T. Geer  
Task Force Office  
Drug Enforcement Administration

I, the Honorable Therese Wiley Dancks, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on the 10<sup>th</sup> day of November, 2022 in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Therese Wiley Dancks  
Hon. Therese Wiley Dancks  
United States Magistrate Judge